

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA (Williamsport)**

IN RE:

DEBORAH L. SAWYER

Debtor

Case No. 4:24-bk-02258-MJC

Chapter 13

Deutsche Bank National Trust Company, as Trustee
for Ameriquest Mortgage Securities Inc.,
Asset-Backed Pass-Through Certificates, Series
2006-R1,

Movant

vs.

DEBORAH L. SAWYER

And

JEFFREY SAWYER (NON-FILING CO-DEBTOR)

Respondents

11 U.S.C. §362 and §1301

MOTION TO CONTINUE HEARING/TRIAL WITH CONCURRENCE

1. Movant filed a Motion for Relief from the Automatic Stay on February 11, 2025. Dkt. No. 30.
2. Debtor filed a response on March 6, 2025. Dkt No. 33.
3. On Wednesday, April 9, 2025, the Parties agreed to continue the matter for at least thirty (30) days to provide Debtor more time to cure default.
4. Accordingly, Movant Now respectfully requests that the hearing scheduled for April 10, 2025, at 10:00 am, be continued.

Dated: April 9, 2025

/s/ Mario Hanyon

Bar No. 314567

Attorney for Creditor

BROCK & SCOTT, PLLC

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DEBORAH L. SAWYER ,
Debtor
And
JEFFREY SAWYER
Co-Debtor

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and exact copy of the foregoing Motion to Continue Hearing has been electronically served or mailed, postage prepaid on this day to the following:

Via Electronic Notice:

Lisa A. Rynard, Debtor's Attorney
240 Broad Street
Montoursville, PA 17754
larynard@larynardlaw.com

Jack N Zaharopoulos, Bankruptcy Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036

United States Trustee, US Trustee
US Courthouse
1501 N. 6th St

Harrisburg, PA 17102

Via First Class Mail:

DEBORAH L. SAWYER
60 Central Avenue
Wellsboro, Pa 16901

JEFFREY SAWYER
60 Central Avenue
Wellsboro, PA 16901

Date: April 9, 2025

/s/Mario Hanyon

Andrew Spivack, PA Bar No. 84439

Matthew Fissel, PA Bar No. 314567

Mario Hanyon, PA Bar No. 203993

Ryan Starks, PA Bar No. 330002

Jay Jones, PA Bar No. 86657

Ryan Snik, PA Bar No. 334854

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